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8 PACIFIC ENVIRONMENTAL ADVOCATES

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 PACIFIC ENVIRONMENTAL
12 ADVOCATES, LLC, a California limited
13 liability company,

14 Plaintiff,

15 vs.

16 VALLEY RECYCLING, INC., a California
17 corporation; JAMES SACHER, an individual;
18 BETTY F SACHER, an individual; and DOES
1-10, inclusive,

19 Defendant.

Case No.: 2:24-cv-02142-CKD

NOTICE OF SETTLEMENT

20 TO THE CLERK OF THE COURT, ANY INTERESTED PARTIES, AND THEIR
21 ATTORNEYS OF RECORD:

22 PLEASE TAKE NOTICE that Plaintiff Pacific Environmental Advocates, LLC (“PEA”)
23 and Defendant Valley Recycling, Inc., James Sacher and Betty F Sacher (“Defendants”), parties
24 in the above-captioned action, have reached a settlement and executed a Settlement Agreement.
25 The Settlement Agreement is contingent upon the expiration of the federal agencies’ 45-day
26 review period.
27
28

PLEASE TAKE FURTHER NOTICE that, in accordance with Title 33 United States Code Section 1365(c), no judgment disposing of this action may be entered prior to 45 days following the receipt of the proposed consent agreement by the United States Department of Justice and the national and Region IX offices of the United States Environmental Protection Agency. *See* 40 C.F.R. § 135.5 (requiring the parties to provide notice to the court of the 45-day agency review period under 33 U.S.C. § 1365(c)).

The regulatory agencies' review period will end on or about **May 27, 2025**. If any of the reviewing agencies object to the proposed agreement, the parties would require additional time to meet and confer and attempt to resolve the agencies' concerns. Consequently, the parties submit that good cause exists to set **June 3, 2025**, as the deadline for the filing of a Stipulation for Dismissal of Plaintiff's Claims with Prejudice, or a Notice that the settlement is null and void.

Dated: April 14, 2025,

Respectfully submitted,

By: 
Xhavin Sinha (CA Bar #309340)
SINHA LAW
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Attorney for Plaintiff
PACIFIC ENVIRONMENTAL ADVOCATES

PROOF OF SERVICE

I, Xhavin Sinha, hereby declare:

At the time of service, I was over 18 years of age and not a party to this action. My business address is Sinha Law, 3901 Lick Mill Blvd., Suite 356, Santa Clara, California, 95054.

On April 14, 2025, I served the following documents(s) in the Eastern District of California Case No.: 2:24-cv-02142-CKD (Pacific Environmental Advocates, LLC v. Valley Recycling, Inc. et. al.):

1. **NOTICE OF SETTLEMENT** (dated April 14, 2025).

by placing a true copy thereof enclosed in a sealed envelope, and/or electronically, and served in the manner and/or manners described below to each of the parties herein and addressed as below:

Saveel Khan, Esq.
Law Office of Randy E. Thomas
18826 N. Lower Sacramento Rd., Suite G
Woodbridge, CA 95258
Office: (209) 369-9255
Fax: (209) 369-9288
email: woodbridgelaw77@yahoo.com

☒ **BY ELECTRONIC MAIL:** I caused said document(s) to be transmitted to the email address(es) of the addressee(s) designated.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on April 14, 2025, at Santa Clara, California.

Respectfully Submitted



XHAVIN SINHA
Attorney for Plaintiff
PACIFIC ENVIRONMENTAL ADVOCATES